

## REMARKS

Claims 1-8 and 16-28 are pending in the present application. Claim 1 has been amended. Claims 22-28 have been allowed. Applicants respectfully request allowance of all of the pending claims in view of the following remarks.

### Claim Rejections - 35 U.S.C. § 112

Claims 1-8 stand rejected under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Applicants respectfully traverse this rejection.

Claim 1 is rejected because it is unclear how the driven biasing member can urge both the first and second platens together if it is only coupled to one of the platens. Applicants have amended claim 1 to indicate that the driven biasing member urges the platen to which it is coupled toward the other platen. Specifically, Applicants have replaced the language "the first and second platens together" with "the one of the platens toward the other platen." This amendment is intended to clarify the previous scope of claim 1 and does not further limit it.

Claim 1 is also rejected because the claim fails to positively recite any critical interrelationship between the platens. Applicants have amended claim 1 to indicate that the first and second platens are "cooperatively opposed" to each other. This amendment is intended to clarify the previous scope of claim 1 and does not further limit it.

Claim 1 is also rejected because it is unclear if the drive mechanism and driven biasing member are coupled to the same at least one platen or to each platen. Embodiments are disclosed both where the drive mechanism and driven biasing member are coupled to the same platen, and where the drive mechanism and driven biasing member are coupled to different platens. For example, as shown in Figure 1, the drive mechanism and driven biasing member may be coupled to the same platen. Alternately, on page 9, lines 5-7, the specification states that "the arms [from the drive mechanism] 112 and 134 could be rigidly connected to the second platen 110 and the driven bias members could be used to connect the first platen 108 to the press base 102." This would allow the drive mechanism and biasing member to be coupled to different platens. Furthermore, as discussed on page 9, lines 13-21 of the specification, "the driving

mechanism is linked either directly or indirectly to at least one of the platens 108 and 110, and the one or more driven bias members are also linked either directly or indirectly to at least one of the platens." Because embodiments are disclosed describing alternate configurations of the driven biasing member and the drive mechanism with respect to the platens, claim 1 describes the critical interrelationships between (1) the drive mechanism and the platens, and (2) the driven biasing member and one of the platens while maintaining sufficient breadth to contemplate all disclosed configurations.

Claim 5 is rejected because it is unclear as to whether the driven biasing member is a spring comprising a spring, guide shaft, and dwell spacer or if the dwell spacer is another component separate from the driven biasing member. Applicants respectfully traverse the rejection. Claim 5 states that the driven biasing member is a "spring driven biasing member," and that it comprises at least the spring, guide shaft, and dwell spacer. By way of a non-limiting example, one possible embodiment is illustrated in Figure 4 and described on page 12. The specification states, "the dwell spacers 150 and 152 reside on guide shafts 132 and 144." See Application page 12, lines 22-23. As seen in Figure 4, the dwell spacer and guide shaft are surrounded by the spring. This combination is one possible example of the driven biasing member of claim 5.

Claim 5 is also rejected because it is unclear if the "arm linked to... the at least one platen" is the same at least one platen. Applicants respectfully traverse the rejection. The prior reference in claim 1 discussing "at least one platen" refers to a coupling to the drive mechanism. Claim 5, as dependent on claim 1, refers to this same "at least one platen."

In light of the above amendments and clarifications, Applicants respectfully request that these rejections be withdrawn. Since claims 2-4 and 8 depend on claim 1, and claims 6-7 depend on claims 1 and 5, Applicants respectfully submit that claims 1-8 are in condition for allowance as being based on allowable claims 1 and 5.

#### Claim Rejections - 35 U.S.C. § 102

Claims 1 and 16-18 are rejected under 35 U.S.C. § 102(b) as anticipated by Rasenberger (4,416,198). Applicants respectfully traverse these rejections.

Claim 1 includes a "driven biasing member" coupled to one of the platens. Rasenberger shows a platen press device with a mechanical four-bar linkage (4, 7, 10, 12, 13). This linkage merely translates the rotational motion of the driving crank to a couple curve motion (5). No structure provides additional force or bias to the plate in addition to the force applied by the driving crank. Rasenberger does not teach or suggest a platen press device with a "driven biasing member". Accordingly, Applicants respectfully assert that it does not anticipate nor render obvious claim 1, and request withdrawal of the pending rejections.

Claims 16-18 depend on claim 1 and include all of the features of claim 1 that is patentably distinct from Rasenberger as described above. Therefore, the Applicants respectfully request withdrawal of the rejection of these claims as well.

### Conclusion

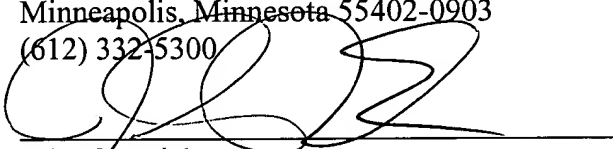
In view of the above amendments and remarks, Applicants assert that the pending claims 1-8 and 16-28 are in condition for allowance, and the Applicants respectfully request that the Examiner pass this application with claims 1-8 and 16-28 to allowance. The Applicants note that there may be other reasons that the pending claims are patentably distinct from the cited reference and otherwise in condition for allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

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